

EXHIBIT 12



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Confidential Treatment Requested
By Email

Ryan Karr
Antitrust Division
U.S. Department of Justice
450 5th St. NW
Washington, DC 20530

September 14, 2021

Re: Civil Investigative Demand No. 30769

Dear Ryan:

I am writing on behalf of Alphabet Inc. (“Company”), in response to the Civil Investigative Demand for 30(b)(6) deposition testimony (“CID”) issued on August 23, 2021.

Consistent with my letter of August 19, 2021, Google objects to Specifications 1a, 1b, 1c, 1d, 1f, 1g, 1h, and 1i in the CID as seeking information protected by the attorney-client privilege and work product doctrine. Google objects to Specification 1e as duplicative, given that two Google witnesses have already provided substantive testimony relating to Project 1Door - a project not included within the scope of my letter of August 19. Google objects to Specifications 1h, and 1i as overly broad and unduly burdensome, as neither of these projects relate to Google’s ad tech business.

With respect to Projects Sunday, Monday, Stonehenge, SingleClick, Banksy, Quantize, Garamond, and Metta, Google objects to Specifications 2c and 2d as seeking information protected by the attorney-client privilege and the work product doctrine. For Specification 2d as it applies to Project 1Door, Google refers the Division to the depositions of [REDACTED]

Subject to and without waiving any of its objections to the CID, Google submits the following information in response to the Specifications 2a, 2b, and 2e.

1. **Specification 2a**



- a. **Division's Request:** "[T]he names of the individuals involved in working on, approving, authorizing, or evaluating the project [identified in Specification 1] and the nature of their involvement[.]"
- b. **Company's Response:**
- i. **Project Sunday:** *Outside counsel:* Axinn, Veltrop & Harkrider, Freshfields, Bruckhaus, Deringer. *Google:* Ted Lazarus, Esq., [REDACTED]
Kent Walker, Esq., [REDACTED]
[REDACTED]
Sundar Pichai, [REDACTED]
Phillip Schindler, [REDACTED]
[REDACTED]
 - ii. **Project Monday:** *Outside counsel:* Axinn, Veltrop & Harkrider. *Google:* Ted Lazarus, Esq., [REDACTED]
[REDACTED]
Scott Spencer, [REDACTED]
[REDACTED]
 - iii. **Project Stonehenge:** *Outside counsel:* Axinn, Veltrop & Harkrider, Slaughter and May. *Google:* Ted Lazarus, Esq., [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
 - iv. **Project SingleClick:** *Outside counsel:* Axinn, Veltrop & Harkrider, Slaughter and May, Wilson Sonsini Goodrich Rosati. *Google:* [REDACTED]
[REDACTED] Ted Lazarus, Esq., [REDACTED]
[REDACTED]
[REDACTED]
 - v. **Project 1Door:** *Outside counsel:* Axinn, Veltrop & Harkrider, Slaughter and May. *Google:* [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



[REDACTED]

- vi. **Project Banksy:** *Outside counsel:* Axinn, Veltrop & Harkrider, Slaughter and May, Freget Glasser & Associates. *Google:* [REDACTED]

[REDACTED]

- vii. **Project Quantize:** *Google:* [REDACTED] Ted Lazarus, Esq.,

[REDACTED]

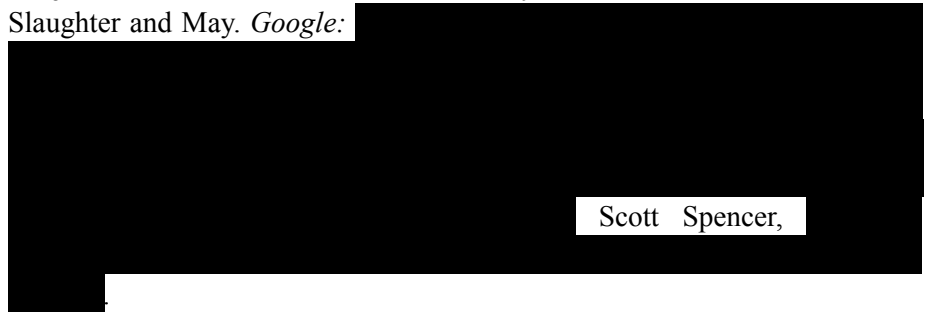
- viii. **Project Garamond:** *Outside counsel:* Allen & Overy, Ashurst, Herbert Smith Freehills, Axinn, Veltrop & Harkrider, Slaughter and May, Cleary Gottlieb Steen & Hamilton. *Google:* [REDACTED]

Kent Walker, Esq.,

[REDACTED]



- ix. **Project Metta:** *Outside counsel:* Cleary Gottlieb Steen & Hamilton, Slaughter and May. *Google:*



2. **Specification 2b**

- a. **Division's Request:** "[T]he time period the project [identified in Specification 1] was undertaken[.]"
- b. **Company's Response:**
- i. **Project Sunday:** July-September 2020.
 - ii. **Project Monday:** March 2021.
 - iii. **Project Stonehenge:** February 2020.
 - iv. **Project SingleClick:** December 2019-February 2020.
 - v. **Project 1Door:** February 2020.
 - vi. **Project Banksy:** February 2020.
 - vii. **Project Quantize:** October 2020.



viii. **Project Garamond:** December 2019.

ix. **Project Metta:** May 2021.

3. **Specification 2e:**

a. **Division's Request:** "[T]he identities of any persons or entities not employed by (or an agent of) Google with whom the project [identified in Specification 1] was discussed (whether orally or in writing) and the content of those discussions."

b. **Company's Response:**

i. **Project Sunday:** Other than outside counsel, none.

ii. **Project Monday:** Other than outside counsel, none.

iii. **Project Stonehenge:** Other than outside counsel, none.

iv. **Project SingleClick:** Other than outside counsel, none.

v. **Project 1Door:** Other than outside counsel, none.

vi. **Project Banksy:** Other than outside counsel, none.

vii. **Project Quantize:** None.

viii. **Project Garamond:** Other than outside counsel, none.

ix. **Project Metta:** Other than outside counsel, none.

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The Company requests confidential treatment of this information to the fullest extent allowed by law, including the Antitrust Civil Process Act, 15 U.S.C. § 1311 et seq., Exemption 4 of the Freedom of Information Act, as well as all other applicable statutes, regulations, and customary confidentiality policies. The Company specifically requests advance notice before disclosure of this information to any person.

Please do not hesitate to contact me with any questions.



Freshfields Bruckhaus Deringer US LLP

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Sincerely yours,

/s/ Julie Elmer